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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

JIEMEI CHEN,)	No. C 05-0720 EDL
)	
Plaintiff,)	SECOND STIPULATION FOR
)	EXTENSION OF TIME TO RESPOND TO
v.)	COMPLAINT AND TO CONTINUE THE
)	CASE MANAGEMENT CONFERENCE;
MICHAEL CHERTOFF, Secretary of the)	PROPOSED ORDER
Department of Homeland Security, et al.,)	
)	
Defendants.)	

Due to incorrect address information, there was a delay informing the beneficiaries that updated documents were necessary to process their travel documents. Because of this, the first extension was insufficient to permit the parties to resolve this matter. Once DHS Beijing receives the updated information, it will be able to issue travel documents for the beneficiaries. This action will then be moot. In order to provide the parties additional time in which to complete the steps remaining for the beneficiaries to receive their travel documents, and thus resolve the action prior to submission of defendants' answer or motion to dismiss, the parties request that the Court approve a second extension of time up to and including August 1, 2005. The parties also ask that the Court continue the case management conference from July 12, 2005 to August 16, 2005, in the hopes that they can resolve the matter prior to the due date for the case

1 management conference statement.

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3 DATED: June 1, 2005

Respectfully submitted,

4 KEVIN V. RYAN
United States Attorney

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6 /s/ Alison E. Daw
ALISON E. DAW
7 Assistant United States Attorney

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9 DATED: June 2, 2005

Respectfully submitted,

10 BAUGHMAN & WANG

11 /s/ Justin X. Wang
12 JUSTIN X. WANG
13 Attorneys for Plaintiff

14 **ORDER**

15 Pursuant to the stipulation of the parties and good cause appearing therefor, IT IS SO
16 ORDERED.

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18 DATED: June 3, 2005

19 ELIZABETH D. LAPORTE
United States Magistrate Judge



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STIPULATION FOR EXTN OF TIME TO RESPOND TO COMPLAINT
AND TO CONTINUE THE CMC
C 05 0720 EDL